

# Initial Notification

## Regulation 1138 – Section 16

### Emission Standards for Area Source Asphalt Processing and Asphalt Roofing Products Manufacturing Operations

**Submittal Date:** The “Initial Notification” must be submitted no later than November 11, 2010 or not later than 120 days after the source’s startup, whichever is later.

[1]	<b>Name of the facility:</b>	Roofs 'R Us, Inc
[2]	<b>Physical location – Street Address:</b>	219 Duncan Road
	<b>City, State, Zip Code :</b>	Marshallton, DE 19808
	<b>Address where any compliance records are kept, if different than the physical location</b>	
	<b>Street Address:</b>	NA
	<b>City, State, Zip Code:</b>	NA
[3]	<b>Name of Owner or Operator:</b>	Benjamin A. West
	<b>Mailing Address:</b>	219 Duncan Road
	<b>City, State, Zip Code:</b>	Marshallton, DE 19808
[4]	<b>Is the facility subject to Section 16 of Regulation 1138?</b>	
	<b><u>Check appropriate box</u></b>	
	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
[5]	<b>Are the asphalt processing and asphalt roofing product manufacturing operations new affected sources or existing affected sources?</b>	
	<b><u>Check appropriate box</u></b>	
	<input type="checkbox"/> New affected sources only	<input type="checkbox"/> Both new and existing affected sources at this facility
	<input checked="" type="checkbox"/> Existing affected sources only	
[6]	<b>Provide a brief description of the asphalt processing and asphalt roofing product manufacturing operations. The description must include nature, size, design, and method of operation of the source.</b>	

The facility consists of two blowing stills (BS-1 and BS-2) in which asphalt is prepared for subsequent manufacture of asbestos roofing products in both shingle and roll.

The asphalt preparation is a batch process that involves blowing air through a hot asphalt flux to raise the temperature at which it will soften. Blowing occurs in a vertical blowing still. Catalysts are used to increase the rate of reaction. The blowing times vary, but are rarely less than 4 hours. BS-1 and BS-2 operate independent, but their exhaust gases are controlled by the same thermal oxidizer (TO-1), which discharges to the atmosphere via stack, SK-22.

There are four coaters used to manufacture roofing products. Coater (C-1) is used to manufacture rolled roofing products. The other three coaters (C-2, C-3 and C-4) are used to manufacture roofing shingles. There are two isolated exhausts on each manufacturing line, the “hot” exhaust from the area where the asphalt is added to the fiberglass and the “cold” exhaust where the rolled product is trimmed to specifications and the shingles are cut to specifications. The “hot” exhaust streams from all four manufacturing lines are controlled by the same high efficiency baghouse filter (F-3), which discharges to the atmosphere via stack, SK-28. The “cold” exhaust streams from all four manufacturing lines are controlled by the same cyclone (CY-1), which discharges to the atmosphere direct from the cyclone.

## **Initial Notification**

### **Regulation 1138 – Section 16**

#### **Emission Standards for Area Source Asphalt Processing and Asphalt Roofing Products Manufacturing Operations**

- [7] **Identify the types of emission points within the asphalt processing and asphalt roofing products manufacturing operation that are subject to Section 16.**

There are two emission points within the facility that are subject to Section 16.

1. The blowing still exhaust from the thermal oxidizer (TO-1) via stack (SK-22) and
2. The “hot” exhaust of the roofing products manufacturing operations from the baghouse filter (F-3) via stack (SK-28)

The “cold” exhaust of the roofing products manufacturing operations does not contain any polycyclic organic matter.

- [8] **Identify the types of hazardous air pollutants (HAPs) emitted by the facility.**

The facility emits polycyclic aromatic hydrocarbons, a subset of a 112(b) hazardous air pollutant, polycyclic organic matter from the asphalt processing and asphalt roofing products manufacturing operations that are subject to Section 16.

Other HAPs emitted at the facility include benzene, toluene, hexane, phenol, and hydrochloric acid.

## Initial Notification

### Regulation 1138 – Section 16

#### Emission Standards for Area Source Asphalt Processing and Asphalt Roofing Products Manufacturing Operations

Name of the facility: Roofs 'R Us, Inc

[9] Is the facility a major source of HAPs or an area source of HAPS?

Check appropriate box

Major source

☐

Area source

☒

[10] I certify that all the information contained in this notification is true, accurate, and complete.

Signature: Benjamin A. West

Date : November 11, 2010

Title/Position: Plant Manager

Telephone No: 302-555-2083

Email Address: bawest@roofsrus.com

Printed Name: Benjamin A. West

[11] The owner or operator must submit this "Initial Notification" form to the following agencies by the submittal date provided on page 1 of this form. Remember to keep a copy of this notification.

Delaware Department of Natural Resources  
and Environmental Control  
Director of Air Quality  
Blue Hen Corporate Mall  
655 S. Bay Road, Suite 5N  
Dover, DE 19901

U. S. Environmental Protection Agency  
Director, Air Protection Division  
1650 Arch Street  
Philadelphia, PA 19103